

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EILEEN LANAHAN,) Case No.: 2:06-cv-1176-LRH-RJJ
vs.)
SOUTHERN NEVADA HEALTH)
DISTRICT, fka Clark County Health)
District,)
Defendant.)

Plaintiff,)
)
)
)
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)
**STIPULATION AND REQUEST
FOR EXTENSION FOR
DEFENDANT TO FILE REPLY TO
PLAINTIFF'S OPPOSITION TO
MOTION FOR SUMMARY
JUDGMENT AND ORDER
THEREON (FIRST REQUEST)**

IT IS HEREBY STIPULATED by the parties, by and through their respective
counsel of record, that Defendant, SOUTHERN NEVADA HEALTH DISTRICT, be
granted an extension of eight days, up to and including, September 10, 2008, within
which to file its Reply to Plaintiff's Opposition to Defendant's Motion for Summary
Judgment ("Plaintiff's Opposition"). Defendant's Motion for Summary Judgment was
filed on July 9, 2008. Accordingly, Plaintiff's Opposition was originally due on July
28, 2008. On August 4, 2008, the above-referenced Court granted Plaintiff its first
extension of time within which to file her Opposition. Again, on August 13, 2008, the
honorable Court granted a second extension of time to Plaintiff to file her Opposition.
Under said Order, Defendant's Reply to Plaintiff's Opposition was due on or before
September 2, 2008.

1 Defendant makes its first request for an extension of time within which to file its
2 Reply to Plaintiff's Opposition because Plaintiff's multiple requests for extensions has
3 pushed the Reply deadline to a time when Defendant's counsel, Shaun P. Haley, has
4 been involved in extensive collective bargaining negotiations, arbitration hearings, and
5 other events on behalf of other clients and, therefore, he has been unable to complete
6 the Reply to Plaintiff's Opposition.

7 This is Defendant's first request for an extension in this matter and is made in
8 good faith and not for any reason of delay.

9 Therefore, it is request that the Court grant Defendant up to and including
10 September 10, 2008, within which to file its Reply to Plaintiff's Opposition.

11 DATED this 2nd day of September, 2008 DATED this 2nd day of September, 2008.

FISHER & PHILLIPS LLP

/s/ Richard Segerblom
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Attorneys for Defendant

IT IS SO ORDERED

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LARRY R. HICKS
UNITED STATES DISTRICT JUDGE

DATED: September 3, 2008